

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

COALITION FOR TJ,

Plaintiff,

v.

FAIRFAX COUNTY SCHOOL BOARD,

Defendant.

No. 1:21-cv-00296-CMH-JFA

PLAINTIFF’S WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and this Court’s Order (Dkt. No. 51), Plaintiff Coalition for TJ, by counsel, respectfully submits the following witness list for trial.

I. Plaintiff’s Fact or Expert Witnesses Expected to be Called at Trial

Name	Address	Purpose
Asra Nomani	May be contacted only through counsel: Erin Wilcox Pacific Legal Foundation 555 Capitol Mall, Ste. 1290 Sacramento, CA 95814	Fact
Glenn Miller	May be contacted only through counsel: Erin Wilcox Pacific Legal Foundation 555 Capitol Mall, Ste. 1290 Sacramento, CA 95814	Fact
Scott Brabrand	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Jeremy Shughart	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Ann Bonitatibus	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact

Karen Keys-Gamarra	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Abrar Omeish	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Rachna Sizemore Heizer	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Megan McLaughlin	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Elaine Tholen	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Melanie Meren	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Tamara Derenak Kaufax	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Ricardy Anderson	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Karen Corbett Sanders	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Karl Frisch	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Laura Jane Cohen	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
Stella Pekarsky	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact

Plaintiff reserves the right to not call any of the above-mentioned witnesses at trial in the interest of time, necessity, or other factors that may arise before or during trial. By identifying witnesses above, Plaintiff does not agree to make a witness available for trial or to offer testimony by deposition, if unavailable.

The order in which the witnesses are listed is not the order in which witnesses will be called at trial. Plaintiff will work with Defendant to agree to procedures for providing advance notice of the order of witnesses.

II. Plaintiff's Fact Witnesses to be Offered by Deposition Testimony

Fairfax County School Board	Gatehouse Administration Center 8115 Gatehouse Rd. Falls Church, VA 22042	Fact
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III. Plaintiff's Fact or Expert Witnesses that May be Called at Trial, If the Need Arises

Himanshu Verma	May be contacted only through counsel: Erin Wilcox Pacific Legal Foundation 555 Capitol Mall, Ste. 1290 Sacramento, CA 95814	Fact
Harry Jackson	May be contacted only through counsel: Erin Wilcox Pacific Legal Foundation 555 Capitol Mall, Ste. 1290 Sacramento, CA 95814	Fact
Ying McCaskill	May be contacted only through counsel: Erin Wilcox Pacific Legal Foundation 555 Capitol Mall, Ste. 1290 Sacramento, CA 95814	Fact
Dipika Gupta	May be contacted only through counsel: Erin Wilcox Pacific Legal Foundation 555 Capitol Mall, Ste. 1290 Sacramento, CA 95814	Fact

Plaintiff reserves the right to call other witnesses, either live or by deposition or by previous trial testimony, for the purpose of impeachment, rebuttal, or any other purpose the law allows, and to call or examine witnesses identified by Defendant.

Plaintiff's Witness List is based on evidence, including documents and testimony, that have been made available by Defendant up to the date of this filing. To the extent Defendant has withheld or otherwise failed to produce non-privileged, responsive documents, or deponents have refused to provide testimony regarding discoverable, non-privileged information, Plaintiff reserves the right to call as witnesses individuals whose identity or relevance to the matters in dispute become apparent from any such late-provided information.

Dated: November 18, 2021.

Respectfully submitted,

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**Pro Hac Vice*

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of November, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. Counsel for Defendant are registered with the Court's CM/ECF system and will receive a notification of such filing via the Court's electronic filing system.

s/ Alison E. Somin
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